

**No. 6:16-cv-00150-MC**

---

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

---

LORI DIANE BACZKOWSKI,

*Appellant,*

v.

BANK OF NEW YORK MELLON, QUALITY LOAN SERVICE  
CORPORATION OF WASHINGTON, and SELECT PORTFOLIO SERVICING,  
INC.,

*Appellees.*

---

On Appeal from an Order of Dismissal of the Honorable Frank R. Alley,  
United States Bankruptcy Judge  
United States Bankruptcy Court for the District of Oregon

Ch. 13 Bankruptcy Case No. 15-62839-fra13  
Adversary Case No. 15-06085-fra

---

**APPELEE QUALITY LOAN SERVICE CORPORATION OF  
WASHINGTON'S JOINDER IN APPELLEES BANK OF NEW YORK  
MELLON AND SELECT PORTFOLIO SERVICING, INC.'S  
ANSWERING BRIEF**

(Request for Oral Argument)

CASEY C. PENCE (OSB # 975271)  
**McCarthy & Holthus, LLP**  
920 SW 3<sup>rd</sup> Ave.  
Suite 100  
Portland, OR 97204  
Telephone: (971) 201-3210  
Facsimile: (971) 201-3202

Attorneys for Quality Loan Service  
Corporation of Washington

## TABLE OF CONTENTS

	<b>Page(s)</b>
I. JOINDER.....	1
II. CONCLUSION.....	1

## **I. JOINDER**

Appellee Quality Loan Service Corporation of Washington joins in the position of, supports the authority contained in, and incorporates herein by this reference, Appellees Bank of New York Mellon, f/k/a The Bank of New York, as Trustee, on Behalf of the Holders of the Alternative Loan Trust 2007-23cb, Mortgage Pass-Through Certificates, Series 2007-23cb and Select Portfolio Servicing, Inc.'s Answering Brief filed in response to the Opening Brief submitted by *pro se* Appellant Lori Diane Baczkowski.

## **II. CONCLUSION**

Quality Loan Service Corporation of Washington respectfully requests that this Court affirm the Adversary Dismissal Order of the Bankruptcy Court.

DATED: July 13, 2016

Respectfully submitted,

McCarthy & Holthus, LLP  
920 SW Third Ave.  
Suite 100  
Portland, OR 97204

By: /s/ Casey C. Pence

CASEY C. PENCE  
OSB NO. 975271

Attorney for Appellee Quality Loan  
Service Corporation of Washington

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing APPELEE QUALITY LOAN SERVICE CORPORATION OF WASHINGTON'S JOINDER IN APPELLEES BANK OF NEW YORK MELLON AND SELECT PORTFOLIO SERVICING, INC.'S ANSWERING BRIEF on the following named person(s) on the date indicated below by

- ☒ mailing with postage prepaid
- ☐ hand delivery
- ☐ facsimile transmission
- ☐ overnight delivery
- ☐ email
- ☐ notice of electronic filing using the Cm/ECF system

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

Lori Diane Bacskowski  
1025 NE Fall Drive  
Grants Pass, OR 97526

Appellant, *Pro Se*

DATED: July 13, 2016.

**McCarthy & Holthus, LLP**

/s/ Casey C. Pence

Casey C. Pence, OSB No. 975271

Telephone: (971) 201-3210

Attorneys for Appellee, Quality Loan  
Service Corporation of Washington